

Sheehan & Associates, P.C.
spencer@spencersheehan.com

505 Northern Blvd Ste 311, Great Neck NY 11021-5101
tel. 516.303.0552 fax 516.234.7800

March 25, 2020

District Judge Rachel P. Kovner
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: 1:19-cv-06448-RPK-CLP
Warren v. Whole Foods Market Group, Inc.

Dear District Judge Kovner:

This office represents the plaintiff. In accordance with your Honor's Individual Practice Rules, plaintiff and defendant request an extension of sixty (60) days for defendant to file an answer or respond to the complaint until Friday, June 5, 2020.

The original date by which defendant is required to answer or respond is Monday, April 6, 2020. There have been no previous requests for an extension of this date. No previous request was granted or denied. Defendant consents to and joins plaintiff in the present request.

The reason for this request is because defendant's counsel, Blaxter Blackman LLP, is based in San Francisco, California, where they are subject to various quarantine and "stay in place" local orders. Further, the undersigned has been informed by opposing counsel that the present crisis has made it especially difficult to obtain information from defendant, which operates grocery stores nationwide that have remained open to serve the communities in which it operates.

The parties request this extension in light of these events and assure the Court that in the time provided by this extension the parties will consider how to proceed and have expressed a desire to explore a resolution of the issues in this case. This request is submitted at least 48 hours prior to the original compliance date. This request does not affect any other scheduled dates. Thank you.

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

Certificate of Service

I certify that on March 25, 2020, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan